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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 RESORTS WORLD LAS VEGAS LLC, a  
 11 Delaware limited liability company,  
 Plaintiff,  
 vs.  
 12 ROCK FUEL MEDIA, INC., a California  
 corporation,  
 13 Defendant.

14  
 15 ROCK FUEL MEDIA, INC., a California  
 corporation,  
 Counterclaimant,  
 vs.  
 16 RESORTS WORLD LAS VEGAS LLC, a  
 17 Delaware limited liability company,  
 Counterdefendant.

Case No: 2:21-cv-02218-JAD-MDC

**STIPULATION AND PROPOSED  
ORDER TO EXPAND DEADLINES  
FOR THE BRIEFING OF MOTIONS  
FILED AS (ECF NO. 128) AND (ECF  
NO. 132)**

[ECF No. 144]

20 RESORTS WORLD LAS VEGAS, LLC (“Resorts World”) and ROCK FUEL MEDIA,  
 21 INC. (“Rock Fuel”), by and through their undersigned counsel, hereby jointly move and stipulate  
 to extend the briefing deadlines related to the briefing of Resorts World Motion to Exclude  
 22 Testimony of Rock Fuel’s Expert James Martin (ECF No. 128) and the briefing of Resorts World  
 Motion for Summary Judgment on Rock Fuel’s Counterclaims (ECF No. 132) pursuant to Local  
 23 Rule 7-2(b) for the reasons outlined below.

24 This litigation concerns trade secret and breach of non-disclosure agreement entered into  
 25 between the parties. The case centers on whether Rock Fuel disclosed “trade secrets” or  
 26 “confidential information” to Resorts World during a September 2018 presentation and whether

1 Resorts World subsequently used that confidential information in adopting applications for its  
 2 Las Vegas property. Resorts World filed its Motion for Summary Judgment (“MSJ”) (ECF No.  
 3 132) and Motion to Exclude Testimony of Rock Fuel’s Expert James Martin (“Daubert”) (ECF  
 4 No. 128) on July 15, 2025.

5 Daubert (ECF No. 128) was appended with over 200 pages of documents and MSJ (ECF  
 6 No. 132) with nearly 1000 pages of documents. Given the volume of the documents appended  
 7 to these two motions it is likely that Rock Fuel’s Oppositions will be similarly appended and  
 8 require additional time to complete the briefing.

9 Counsel for the parties agree that additional time to respond is necessary to assist the  
 10 parties in preparing briefing due to the stipulated extended page limits of the pleadings, the  
 11 extensive appendices, and the travel and work schedules of counsel. The parties therefore  
 12 mutually agree and stipulate that Rock Fuel’s Oppositions to Daubert (ECF No. 128) & MSJ  
 13 (ECF No. 132) be due on August 12, 2025 and Resorts World’s Replies be due on September  
 14 3, 2025.

15 **IT IS SO STIPULATED.**

16 DATED this 24<sup>th</sup> day of July, 2025.

17 **GREENBERG TRAURIG, LLP**

18 /s/ *Behthany L. Rabe*

19 Mark G. Tratos (NV Bar No. 1086)  
 20 Bethany L. Rabe (NV Bar No. 11691)  
 Kimberly J. Cooper (NV Bar No. 9533)  
 10845 Griffith Peak Drive, Suite 600  
 Las Vegas, NV 89135  
*Attorneys for Resorts World Las Vegas*

21 DATED this 24<sup>th</sup> day of July, 2025.

22 **SPENCER FANE**

23 /s/ *Linda K. Williams*

24 Vincent J. Aiello (NV Bar No. 7970)  
 Linda K. Williams (NV Bar No. 12135)  
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 Las Vegas, NV 89101  
*Attorneys for Rock Fuel Media, Inc.*

25 **ORDER**

26 Based on the parties’ stipulation [ECF No. 144] and with good cause appearing, IT IS  
 27 HEREBY ORDERED that Rock Fuel’s oppositions to Resorts World’s *Daubert* motion [ECF No.  
 28 128] and motion for summary judgment [ECF No. 132] are now due on **August 12, 2025**. Resorts  
 World’s replies are due on **September 3, 2025**.

*Doege*  
 29 \_\_\_\_\_  
 UNITED STATES DISTRICT JUDGE  
 30 DATED: July 24, 2025

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